



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Health Care Safety and Quality
Division of Health Care Facility Licensure & Certification
67 Forest Street, Marlborough, MA 01752

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August 12, 2020

Andrew Levine, Esq.
Barrett & Singal
One Beacon Street, Suite 1320
Boston, MA 02108

BY EMAIL ONLY

Re: Essential Services Finding
Facility: Holyoke Medical Center
Services: 13 Bed Obstetrics Service,
10 Bassinet Well Infant Nursery
Ref. #: 2145-296

Dear Attorney Levine:

On July 28, 2020, the Department of Public Health (the "Department") held a public hearing in response to the notification received from you on behalf of Holyoke Medical Center, Inc. regarding the proposed plans to discontinue operation of its thirteen (13) bed Obstetrics Service and ten (10) bassinet Well Infant Nursery at Holyoke Medical Center (the "Hospital") in Holyoke, MA, effective October 1, 2020. As a result of its review, including testimony presented at the hearing, the Department has made a finding that the services provided by the Hospital are in fact necessary for preserving access and health status within the Hospital's service area.

Accordingly, pursuant to 105 CMR 130.122(F), the Hospital is required to prepare a plan that details how access to inpatient maternity beds and bassinets will be maintained for the residents of the service area. The plan must be submitted to the Department no later than 15 calendar days of receipt of this letter. The Hospital's plan must include the elements specified in 105 CMR 130.122(F) as listed below:

- (1) Information on utilization of the services prior to proposed closure;

- (2) Information on the location and service capacity of alternative delivery sites. Include an explanation of the basis for the Hospital's determination that the alternative delivery sites **do** or **do not** have the capacity (necessary space, resources, etc.) to handle the increased patient volume at the identified sites. To support that assertion, please provide the following specific details:
 - (a) Current utilization at these alternative sites;
 - (b) Type of services available at the alternative sites;
 - (c) Type of medical diagnoses accepted; and
 - (d) Adequacy of space and resources at the alternative sites.
- (3) Travel times to alternative service delivery sites, for both peak and non-peak travel times, and an explanation as to the source for this information or what these estimates are based on;
- (4) An assessment of transportation needs post discontinuance and a plan for meeting those needs;
- (5) A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service; and
- (6) A protocol that describes how patients in the Hospital's service area will access the services at alternative delivery sites. The protocol should specifically address the following:
 - (a) The process that will be employed to effectively refer patients to other facilities or providers;
 - (b) The impact that this may have on the current occupancy rates at alternative delivery sites;
 - (c) The ability of the alternative delivery sites to meet the needs of these patients; and
 - (d) Other alternatives if medical needs cannot be accommodated at the proposed alternative sites.

In addition to the regulatory elements listed above, and in light of the Department's review of testimony on the proposed closure, your plan must also address the following:

- (1) **Transportation Needs of Population Served:** Based on testimony submitted to the Department and presented at the hearing on July 28, 2020, concern was expressed regarding the burden traveling from Holyoke to other areas will have on expectant mothers. The plan which you are required to submit must address the effects of traveling on expectant mothers and include information as to what options will exist to meet the transportation needs of patients in the community and how they will be made aware of these options.
- (2) **Access to Family Planning Services:** Based on testimony presented at the hearing on July 28, 2020, concern was expressed regarding the potential lack of access to birth control for patients going to Mercy Medical Center. The plan which you are required to submit must include information on steps

taken to ensure patients have continued access to birth control and other sexual and reproductive health services after Obstetrics Services are discontinued at Holyoke Medical Center.

- (3) **Cultural and Linguistic Needs:** Based on testimony presented at the hearing on July 28, 2020, concern was expressed regarding the potential lack of bi-lingual services at other care sites. The plan which you are required to submit must address the Hospital's plans to meet the cultural and linguistic needs of patients from the Hampden County area community when referring these patients to alternate facilities.
- (4) **Engagement with Community Groups:** Based on testimony submitted to the Department and presented at the July 28, 2020 hearing, concern was expressed that Holyoke Medical Center failed to appropriately communicate with the local community to assess the impact of eliminating these services on patients and families in need, and possible alternatives to the elimination of Obstetrics Services and the Well Infant Nursery at Holyoke Medical Center. The plan which you are required to submit must address how Holyoke Medical Center intends to initiate ongoing engagement with the local community to ensure they are aware of the impact of the discontinuance of these services and their input on the development and implementation of a plan to ensure access in the future.

Under the provisions of 105 CMR 130.122(G), the plan the Hospital submits to the Department will be reviewed to determine if it appropriately assures access to the essential services in question following the plans to discontinue operation of thirteen Obstetrics Service beds and ten bassinets Well Infant Nursery.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at Sherman.Lohnes@State.MA.US.

Sincerely,



Sherman Lohnes
Division Director

cc: E. Kelley, DPH
S. Davis, DPH
R. Rodman, DPH
M. Callahan, DPH